

Return Day July 23, 2019	:	SUPERIOR COURT
K.J. PPA ANNE JOYCE	:	J.D. OF STAMFORD
v.	:	AT STAMFORD
WESTON BOARD OF EDUCATION	:	June 21, 2019

COMPLAINT

1. During the 2018-19 school year the plaintiff, a minor, was a student in Grade Nine at Weston High School (the 'school').
2. The defendant operates and maintains the school pursuant to Conn. Gen. Stats. Chapter 170.
3. On December 10, 2018, at a practice at school for the freshmen boys' basketball team, a teammate punched the plaintiff in the mouth, inflicting serious physical and emotional harm.
4. The man the defendant employed to coach the team was the only coach present at that practice.
5. At that time that employee did not hold a current, valid coaching permit from the State of Connecticut's Department of Education.
6. Defendant's Policy 4116 enumerates the duties of the "athletic coaches" it employs. The policy states that by 'athletic coaches' it means "any person holding (and required to hold) a coaching permit issued by the Connecticut State Department of Education who is hired by the Board to act as a coach for a sport season and shall include only coaches who have direct responsibility for one or more teams."
7. Conn. Gen. Stat. § 10-149d states that athletic directors for athletic programs such as the

one in which the plaintiff took part shall ensure “that each athletic coach in the athletic program holds a coaching permit issued by the state board,” i.e., the State of Connecticut’s State Board of Education.

8. The defendant’s athletic director knew that on December 10, 2018 the coach held no permit, yet he still allowed him to coach the freshmen boys’ basketball team.

9. This agent of the defendant had a ministerial duty to employ a coach with a permit.

10. Acting within the scope of his official duties the defendant’s athletic director breached that duty.

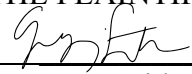
11. Said breach proximately harmed the plaintiff.

12. Conn. Gen. Stats. §52 – 557n(a)(1)(A) makes the defendant liable to the plaintiff for its agent’s breach of his duty.

13. The plaintiff is entitled to relief from the defendant for his injuries.

PRAYER FOR RELIEF

WHEREFORE, the plaintiff prays that this court enters a judgment that declares that the defendant’s acts and omissions, as set forth above, violate this state’s laws against negligence; awards damages, fees and costs to him in compensation for these violations; and grants such further relief as this court deems just.


THE PLAINTIFF
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STATEMENT OF AMOUNT IN DEMAND

The plaintiff demands fifteen thousand dollars or more, exclusive of interest and costs.

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